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**REDACTED FOR PUBLIC INSPECTION**

November 6, 2019

**Via Electronic Filing**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

**Re: Report on Initial Commercial Deployment (ICD) of Google LLC's Spectrum Access System (SAS) in the Citizens Broadband Radio Service (CBRS) (GN Docket No. 15-319)**

Dear Ms. Dortch:

Google LLC (Google) hereby submits the attached report (ICD Report) demonstrating the test results and compliance of its SAS during its ICD reporting period from September 16, 2019, through October 31, 2019. Pursuant to 47 C.F.R. §§ 0.457, 0.459, Google requests confidential treatment for the ICD Report, which has been marked "CONFIDENTIAL, NOT FOR PUBLIC INSPECTION" and filed by hand delivery with the Commission.

The confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA"). Certain portions of the confidential information also implicate operational security concerns for the U.S. Navy, and thus further merit confidential treatment by the Commission. In support of this request and pursuant to Section 0.459(b) of the Commission's rules, Google hereby states as follows:

**1. Identification of the specific information for which confidential treatment is sought.** Google requests confidential treatment with respect to the confidential information in the ICD Report, which is redacted from the version marked "REDACTED FOR PUBLIC INSPECTION" and filed electronically with the Commission.

**2. Identification of the circumstance giving rise to the submission.** Google submits the ICD Report in support of its application for final certification as a CBRS SAS Administrator in an open Commission proceeding.

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**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.** The confidential information in the ICD Report contains and reveals highly sensitive commercial information specific to Google's SAS. This information is generally safeguarded from competitors and is not made available to the public.

**4 Explanation of the degree to which the information concerns a service that is subject to competition.** The confidential information details the functioning of Google's SAS. Google and other SAS Administrator compete vigorously on the basis of the interference analysis and spectrum management services provided through these products.

**5. Explanation of how disclosure of the information could result in substantial competitive harm** Disclosure of the redacted information could cause substantial competitive harm to Google, because it would provide competitors insight into confidential research, development, operational, and strategic information that would not otherwise be available, which would work to Google's severe competitive disadvantage.

**6. Identification of any measures taken to prevent unauthorized disclosure.** Google routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties** The redacted information and the product information it reflects is not available to the public, and this information has not been previously disclosed to third parties.

**8 Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.** Google requests that the redacted information be treated as confidential on an indefinite basis as it cannot identify a date certain on which this information could be disclosed without causing competitive harm to Google.

Please let us know if you have any questions about this submission.

Respectfully submitted,



Megan Anne Stull  
Counsel



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**Re: Report on Initial Commercial Deployment (ICD) of Google LLC's Spectrum Access System (SAS) in the Citizens Broadband Radio Service (CBRS) (GN Docket No. 15-319)**

Dear Ms. Dortch:

Google LLC (Google) submits this report (ICD Report) demonstrating the test results and compliance of its CBRS SAS during its ICD reporting period from September 16, 2019, through October 31, 2019. This ICD Report demonstrates that Google's SAS complies with Commission rules and with the requirements of the Commission's ICD Public Notice.<sup>1</sup>

Because the ICD Report demonstrates that Google's SAS complies with the Commission's rules, Google respectfully requests that the Commission expeditiously conduct its review of this ICD Report and grant Google's application for final certification as a CBRS SAS Administrator. Doing so will unleash the promise of CBRS to enable and expand 5G connectivity for American businesses and consumers, maintaining United States leadership in broadband innovation.

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<sup>1</sup> *Wireless Telecomms. Bureau and Office of Eng'g and Tech. Establish Procedure and Deadline for Filing Spectrum Access System Initial Commercial Deployment Proposals*, 33 FCC Rcd 7390 (2018).

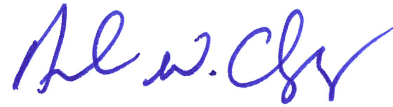
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Please let us know if you have any questions about this submission.

Respectfully submitted,



Megan Anne Stull  
Counsel



Andrew W. Clegg  
Spectrum Engineering Lead  
Google LLC

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

Spectrum Access System Initial  
Commercial Deployment Proposals

GN Docket No. 15-319

**GOOGLE LLC REPORT ON THE  
INITIAL COMMERCIAL DEPLOYMENT OF ITS SPECTRUM ACCESS SYSTEM**

**[REDACTED]**